

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:

David Kirkland Andrews
Debtor
xxx-xx-6982

BK: 22-03257-MH1-13

David Kirkland Andrews
Plaintiff

vs.

Internal Revenue Service
Defendant

Adv. No. 23-AP-90003

**JOINT MOTION TO CONTINUE THE
PRETRIAL CONFERENCE IN ADVERSARY PROCEEDING**

COMES NOW The United States of America, on behalf of its agency, the Internal Revenue Service (the Defendant), by and through its attorney, Ward W. Benson, and Keith D. Slocum, counsel for Plaintiff, and move for an Order Continuing the Pretrial Conference.

In support of this Motion, the parties state that they have engaged in substantive discussions exploring the potential to resolve this matter. More time is needed to research the returns and transcripts to determine if additional filings are necessary.

The parties would request Pretrial Conference be rescheduled for sixty days.

Respectfully Submitted,

/s/ Keith D. Slocum
Keith D. Slocum, BPR No. 023024
Harlan/Slocum/Quillen
39B Public Square
Po Box 949
Columbia, TN 38402-0949

931-381-0660 – Telephone
931-381-7627 – Fax
bknotices@robertharlan.com

Attorneys for Plaintiff

DAVID A. HUBBERT
Deputy Assistant Attorney General

/s/ Ward W. Benson
WARD W. BENSON
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 227, Ben Franklin Station
Washington, DC 20044
Tel: (202) 514-9642
Fax: (202) 514-6866
Email: ward.w.benson@usdoj.gov

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2023, the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s/ Keith D. Slocum

Keith D. Slocum – BRP 023024